Project Schedule Milestones Site Remediation Project Arsynco, Inc. Property Carlstadt, New Jersey

TASK DESCRIPTION	PROJECTED START / AGENCY DEADLINE
Effective Date of EPA TSCA Approval	July 21, 2009
Initial Submittal of Engineering & Monitoring Plan w/ Project Schedule to EPA (#1)	September 30, 2009
Receipt of EPA Comments on Engineering & Monitoring Plan	March 29, 2010
Submittal of Revised Engineering & Monitoring Plan and Project Schedule to EPA (#2)	3rd Quarter, 2010
Submittal of Sampling Plan (as Appendix to E&M Plan) to EPA	4th Quarter, 2010
MAJOR WORK SCOPE ITEMS	
Permitting	On-going for project duration
Initial Site Clearing Activities	1st Quarter, 2010
Asbestos Abatement (Building 16)	2nd Quarter, 2010
Demolition of Remaining Site Structures	3rd Quarter, 2010
Finalize Engineering & Monitoring Plan (including confirmatory sampling plan) with EPA	1st Quarter, 2011 *
Finalize Design Details of Air Sparge Treatment System	1st Quarter, 2011
Additional PCB Delineation & Characterization Sampling	2nd Quarter, 2011 * ^
Bid Solicitation, Procurement of Subs, Site Clearing & Setup (Air Sparge System)	2nd Quarter, 2011
Bid Solicitation, Procurement of Subs, Site Clearing & Setup (PCB Remediation)	4th Quarter, 2011
Additional RI for Deep GW & Pilot Testing, as necessary	3rd Quarter, 2011
Installation of Shallow GW Remediation System (Sec. 1&2)	4th Quarter, 2011 ^
PCB Material Excavation & Off-site Disposal (>500ppm)	2nd Quarter, 2012 * ^
Backfill Areas where PCB Material Removed for Consolidation	4th Quarter, 2012 * ^
PCB Material Consolidation (50 - 500 ppm)	1st Quarter, 2013 * ^
Installation of Shallow GW Remediation System (Sec. 3&4)	4th Quarter, 2012 ^
Tract 2 Soil Remediation & Mitigation	3rd Quarter, 2013
Shallow GW Treatment System Operation (Sec. 1&2)	4th Quarter, 2013
Construct Caps in TSCA Disposal Areas	4th, Quarter, 2013 * ^
Install Well Clusters in relation to TSCA Disposal Areas	1st Quarter, 2014 * ^
Channelize Southern Drainage Ditch	2nd Quarter, 2014
Construct TSCA Disposal Area Flood Control Berms Shallow GW Treatment System Operation (Sec. 3&4)	3rd Quarter, 2014 4th Quarter, 2014
Install Remainder of Perimeter Fencing Per TSCA Approval	4th Quarter, 2014
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Shallow Soil Confirmatory Sampling for VOCs in Air Sparge System Areas	1st Quarter, 2015 ^
Installation & Operation of Deep GW Remediation System	2nd, Quarter, 2015
Site-wide Grading and Install Site-wide cap controls	2nd Quarter, 2015 ^
Quarterly Sampling of Well Clusters for TSCA Disposal Areas (3 yr. Duration)	3rd Quarter, 2016
Quarterly Shallow MNA GW Sampling After Shutdown of Air Sparge System (2 yrs.)	1st Quarter, 2017
Quarterly Deep MNA GW Sampling After Shutdown of Deep Treatment System (2 yrs.)	2nd Quarter, 2017
Annual GW Sampling of Well Clusters for TSCA Disposal Areas (27 yrs. After year 3)	3rd Quarter, 2043
AGENCY SUBMITTALS	
EPA SUBMITTALS	
Submit Initial Engineering & Monitoring Plan to EPA	September 30, 2009
Submit Revised Engineering & Monitoring Plan to EPA	3rd Quarter, 2010
TSCA Remedial Action Status Quarterly Reports to EPA	October 20, 2009 (Quarterly Thereafter thru 1st Qtr. 2015)
Submit Proof of Financial Assurance for Perpetual Monitoring & Maintenance to EPA	4th Quarter, 2010
Submit Location of "Consolidated Material TSCA Disposal Area" to EPA	3rd Quarter, 2011
Submit Well Cluster Location Notice to EPA	3rd Quarter, 2011 3rd Quarter, 2013
Submit Copy of TSCA Disposal Area Deed Notice to EPA	4th Quarter, 2014
Annual Summary Reports to EPA	July 1, 2015 (Annually Thereafter on July 1st - 30 year Duration)

- Notes:

 * Schedule for task is contingent on actual time for EPA review and approval of E&M Plan

 ^ Actual schedule for task is dependent on weather.